

REMARKS

Claims 1, 2, 4-6, 8-16, 18-26, 39-42, 45, 47 and 48 were pending in the Application prior to the outstanding Office Action. In the Office Action, claims 1, 2, 4-6, 8-16, 39-42, 45, 47 and 48 were rejected under 35 U.S.C. §103(a). Applicants have amended claims 1, 10, 14-15, 21, 23 and 45, and have cancelled claims 2 and 16.

I. RESPONSE TO REJECTIONS UNDER 35 U.S.C. §103(a)

On page 3 of the Office Action, the Examiner rejected claims 1, 2, 4-6, 8-16, 18-26, 39-42, 45, 47 and 48 under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,470,227, issued to Rangachari et al. (“*Rangachari*”), in view of U.S. Patent No. 6,463,352, issued to Tadokoro et al. (“*Tadokoro*”), further in view of U.S. Patent No. 6,944,584, issued to Tenney et al. (“*Tenney*”).

A. Independent Claim 1

Claim 1 recites:

“receiving a first request from the remote client system via the first network, the first request containing a uniform resource locator path including a function field and an object field;

determining a function to be performed on the tool identified in said object field in said uniform resource locator path based on said function field in said uniform resource locator path;

in response to said first request, sending a first message to the tool identified in the object field in the uniform resource locator path via the second network, said first message is operable for controlling an action of the tool identified in the object field in the uniform resource locator path.”

The combination of *Rangachari*, *Tadokoro* and *Tenney* does not render the method recited in claim 1 obvious. *Rangachari* does not disclose a tool management method that “[determines] a function to be performed on the tool identified in said object field in said uniform resource locator path based on said function field in said uniform resource locator path

[of a request received from a remote client system].” In contrast, *Rangachari* discloses an object-oriented programming environment for configuring application objects into a tool process workflow. *Rangachari* discloses that “workflows 106 may be created or modified by manipulating a graphical user interface (GUI) to lay out activities and sub-processes as a series of connected activity objects.” Col. 9, lines 22-25. A GUI is used to manipulate activity clients 108 to design and modify workflows 102. Col. 9, lines 33-36. *Rangachari* discloses that “activity clients invoke specific methods on the Application Servers 49 (FIG. 1) to accomplish a specific activity 1067 as part of the execution of a workflow.” Col. 9, lines 39-42. At best, the GUI in *Rangachari* comprises a “remote client system.” *Rangachari* does not disclose that an application server receives a request from the GUI “containing a uniform resource locator path including a function field and an object field.”

The Examiner cites *Tadokoro* to disclose “a system from controlling software components for machines in a distributed manner.” In particular, *Tadokoro* discloses a system for managing the process flow of cutting machines. Fig. 2a of *Tadokoro* illustrates such a system. In the system, data acquisition devices 3 send information to a virtual machine component 5, which runs on a personal computer 5.1. Each personal computer 5.1 has its own unique IP address and is assigned to a tool. *Tadokoro* discloses that an IP address is equivalent to a uniform resource locator (URL) because a URL corresponds to an IP address. However, an IP address is not equivalent to a “uniform resource locator path including a function field and an object field.” *Tadokoro* cannot determine what function to perform on a tool “identified in said object field in said uniform resource locator path based on said function field in said uniform resource locator path.” In other words, *Tadokoro* cannot determine what function to perform on a tool based on the IP address assigned to the personal computer 5.1. At best, *Tadokoro* would modify the object-oriented programming environment in *Rangachari* by adding a unique IP address of a computer 5.1 to the workflow process.

The Examiner cites *Tenney* to disclose client-server communications via a web browser. Col. 6, lines 55-65. At best, *Tenney* would add that the GUI in *Rangachari* could communicate with an Application Server 49 via a web browser. *Tenney* cannot modify the *Rangachari-Tadokoro* combination to determine “a function to be performed on the tool identified in said object field in said uniform resource locator path based on said function field in said uniform resource locator path.”

Therefore, Applicants respectfully suggest that the method recited in claim 1 is not obvious over the *Rangachari-Tadokoro-Tenney* combination.

Dependent claims 2, 4-6 and 8-14 depend directly or indirectly from independent claim 1. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 2, 4-6 and 8-14 are allowable for at least the reasons set forth above concerning independent claim 1.

B. Independent Claim 15

For at least the same reasons discussed above regarding claim 1, the system recited in claim 15 is not obvious over the combination of *Rangachari, Tadokoro* and *Tenney*.

Dependent claims 16, 18-26, 39-42, 45 and 47-48 depend directly or indirectly from independent claim 15. These dependent claims include all of the limitations of the independent claim from which they depend. Applicants respectfully assert that dependent claims 16, 18-26, 39-42, 45 and 47-48 are allowable for at least the reasons set forth above concerning independent claim 15.

Additional Remarks

The references cited by the Examiner but not relied upon have been reviewed, but are not believed to render the claims unpatentable, either singly or in combination.

In light of the above, it is respectfully submitted that all of the claims now pending in the subject patent application are allowable, and a Notice of Allowance is requested.

The Commissioner is authorized to charge any underpayment or credit any overpayment to Deposit Account No. 50-1826 for any matter in connection with this response, including any fee for extension of time, which may be required.

Respectfully submitted,

Date: January 15, 2008

By: _____ / **Scott D. Sanford** / _____

Scott D. Sanford
Reg. No. 51,170

Scott D. Sanford, Esq.
VIERRA MAGEN MARCUS & DENIRO LLP
575 Market Street, Suite 2500
San Francisco, California 94105-2871
Tel: (415) 369-9660
Fax: (415) 369-9665
Email: ssanford@vierramagen.com